

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

ABC CORPORATION I,  
ABC CORPORATION II,

*Plaintiffs,*

v.

THE PARTNERSHIPS AND  
UNINCORPORATED ASSOCIATIONS  
IDENTIFIED ON SCHEDULE A,

*Defendants.*

Case No. 1:20-cv-4806

Judge Thomas M. Durkin

Magistrate Judge Jeffrey Cole

**DECLARATION OF CHANDLER E. STURM**

I, Chandler E. Sturm, hereby declare as follows:

1. I am an attorney at Tarter, Krinsky & Drogin LLP, counsel of record for Plaintiffs Hangzhou Chic Intelligent Technology Co., Ltd. (“Chic”) and Unicorn Global, Inc. (“Unicorn”, and collectively with Chic, “Plaintiffs”).
2. I make this Declaration in support of Plaintiffs’ Opposition to Defendants’ Motion to Strike Plaintiffs’ Expert Report.
3. Attached hereto as **Exhibit A** is a true and correct copy of the Expert Report of Paul Hatch served on Defendants during expert discovery on August 15, 2022.
4. Attached hereto as **Exhibit B** is a true and correct copy of the Paul Hatch Rebuttal Report to Jim Gandy Expert Report served on Defendants during expert discovery on September 12, 2022.

5. Attached hereto as **Exhibit C** is a true and correct copy of the Paul Hatch Rebuttal Report to Lance Rake Expert Report served on Defendants during expert discovery on September 12, 2022.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: February 22, 2023  
New York, New York

By: Chandler Elizabeth Sturm  
Chandler E. Sturm